



LEONARDO M. ALDRIDGE

Attorney-At-Law  
66 Willoughby St., Floor 2  
Brooklyn, NY 11201

*MEMO ENDORSED*

February 25, 2021

3/1/21

Request to travel granted.  
Defendant must provide his  
itinerary to his pre-trial officer

*Colleen McMahon***BY ECF**

Hon. Colleen McMahon  
United States District Judge  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

Re: U.S. v. Richard Lotito, Cr. No. 20-675

Your Honor:

Mr. Richard Lotito respectfully requests permission to travel to Florida for a one-week family vacation. If allowed by the Court, Mr. Lotito will travel with his common-law wife Joanna, their 4-year-old daughter Melania, and Joanna's teenage daughter and son to Disney World Resort in Orlando, Florida, from March 27 until April 3. They plan on staying at a hotel inside the theme park called Disney Art Animations Resort, located at 1850 Animation Way, Orlando, FL 32830.

Mr. Daniel Wolf, the AUSA assigned to this case, has stated that the government defers to whatever recommendation the U.S. pre-trial officer supervising Mr. Lotito makes. Ms. Myrna Carrington, a pre-trial services officer from the Southern District of New York, wrote me in an email that she had no objections to Mr. Lotito's planned travel as long as Mr. Nicholas Zotti approved of it. Mr. Zotti is the pre-trial services officer from the District of New Jersey who directly supervises Mr. Lotito.

Mr. Zotti stated in an email that he did not object to Mr. Lotito's travel, but that he should submit his flight and hotel information to him prior to his departure if the Court indeed authorizes him to travel.

Case 1:20-cr-00675-CM Document 35 Filed 02/25/21 Page 2 of 2

Because there is no objection from the pre-trial services officers supervising Mr. Lotito nor by the government, and because Mr. Lotito has complied with all the court's rules and conditions since he was released on bail, the defense respectfully requests that this Honorable Court grant Mr. Lotito's unopposed request to travel for a one-week family vacation to Orlando, FL.

Respectfully,

**S/Leonardo M. Aldridge**  
CJA Counsel for the Defendant

Cc. AUSA Daniel Wolf (through e-mail)